

VIM Recycling Call Notes 3-30-09

Attendees:

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Current Status:

- Located in Elkhart, IN.
- The VIM facility has been under IDEM air enforcement since 2001 and waste enforcement since 2007
- This facility processes three types of waste A, B, and C. These waste classifications are regulated under IDEM's air program, not the solid waste program.
 - A waste - Tree debris
 - B waste – manufactured wood products such as particle board, various processed woods
 - C waste – former B waste that has significant degradation along with C&D waste from Hurricane Katrina
- B&C waste cannot be processed on site without a solid waste processing permit from IDEM
- Currently 20% of the "C" pile has been processed
- In June 2007, an explosion at the facility started the "C" waste on fire.
- The "C" pile is smoldering and emitting smoke and other compounds into the neighboring community
- Local nuisance ordinances cover the noise issues related to the facility not IDEM.
- The local fire marshal is concerned about access to the facility if a fire does occur

Air Issues:

- VIM is currently operation under an existing CAA Title 5 permit
- IDEM has received and reviewed the facility's Title 5 renewal and is prepared to issue the permit
- USEPA has reviewed and commented on the Title 5 renewal
- The facility will be applying for a minor permit for a pre-shredder
- There has been no prolonged VOC monitoring done on the site. On 3-29-09, an emergency responder was called to the site and did preliminary monitoring, but had no VOC detects.
- Most of the citizen complaints have been dust related. However, there have been several complaints about odor and smoke migrating offsite

Water Issues:

- It appears that the VIM facility is operating without any surface water controls
- Some of the piles are producing "leachate-like" liquids
- The facility has been operating without a general industrial stormwater permit
- This site was constructed with underground discharge pipes that channel liquids to a detention basin
 - There were originally 3 retentions ponds but 2 have been filled in with debris. One pond remains but it is unlined
- Groundwater testing would be moot because of the CSX superfund site across the street

Waste Issues:

- IDEM cannot stop the facility from accepting A grade waste since this material is not regulated
- Currently the facility does not have a solid waste processing permit to process the B & C piles
- The facility was denied a marketing permit in December 2, 2008.
- Since the facility cannot process the B&C piles, the facility is performing minimal management to these piles

Regulatory options:

- Odors, smoke, noise fall under the authority of local ordinances – as far as the participants in this meeting know, these ordinances have not been invoked regarding this site
- Use of RCRA, CAA or SF options can be evaluated

Next steps:

- (1) IDEM OLQ will discuss with USEPA MMB how EPA might assist IDEM at this site
- (2) EPA may accompany IDEM enforcement personnel to the facility to discuss their waste management practices and advise them on options.